



# PCW/Supplier Forum

Data Capture, Validation & Transfer Working Group – Meeting 3  
25 June 2021

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# Competition Act Reminder

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- In taking part in this meeting, participants are confirming that they have undergone relevant training to raise their awareness of, and ensure compliance with, applicable competition law, including the Competition Act 1998 and Articles 101 and 102 EC and that they will not discuss matters that would or might lead to any breaches of competition law.

# Agenda

Item	Topic
1	<i>Introduction and meeting aims</i>
2	<i>Update on Data Capture (actions from last meeting)</i>
3	<i>Discussion: Data Validation (including topics)</i> <ul style="list-style-type: none"><li>• <i>Standstill Period</i></li><li>• <i>Market Sector Indicator</i></li><li>• <i>Meter Type validation</i></li><li>• <i>Retail Energy Location</i></li></ul>
4	<i>Discussion: Gas &amp; Electricity Enquiry Services</i>
5	<i>Conclude Vulnerability / Priority Services Register discussions</i>
6	<i>Consideration of process map and timings (five and next WD scenarios)</i>
7	<i>Proposed Work Plan for this Working Group and dates of future meetings</i>
8	<i>Review of Actions Log</i>
9	<i>Updates/additions to the Forum Risk Register</i>
10	<i>AOB</i>

# 1. Introduction and meeting aims

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- Continued discussion on the topic of **Data Capture**, consideration of Forum member views since the last Working Group session
- Discuss future **Data Validation** requirements including the topics: Standstill Period, Market Sector Indicator, meter type validation and Retail Energy Code
- Discuss Forum member views on whether presentation by Gas & Electricity Enquiry Service providers would be beneficial at a future Working Group session
- Conclude discussions on the topic of Vulnerability / Priority Services Register
- Review the updated high-level process map/timelines for Data Capture, Validation & Transfer and consideration against faster switching timescales
- Approach to the remaining Working Group meetings and confirmation of future meeting dates
- Review the Working Group Actions Log
- Review and update the Forum Risk Register as required.
- Finally, consider any items of AOB from Working Group members

## 2. Update on Data Capture

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- There was an action on all Forum members at the last Working Group meeting.
  - *Data Capture – further to our discussions on 27 May, please advise the Chair of any further comments you have on the topics of Change of Tenancy, Credit Vetting, Opening Meter Reads, Market Sector Indicator, Consent to bill during cool-off, Consumer Requested Switch Dates.*
- As there have been no substantive comments received, the following topics are now deemed to be concluded:
  - *Credit Vetting, Opening Meter Reads, Consent to bill during cool-off & Consumer Requested Switch Date*
- *Market Sector Indicator* – this will be discussed later when we consider Data Validation.
- *Change of Tenancy* – will be discussed at meeting 4 of this Working Group on 28 July.

# Data Capture Requirements (1)

- An updated version of the Data Capture Requirements Paper (v0.3) has been prepared.

<u>Data Capture requirements</u>		v0.3	21-Jun-21				
The table below details Data Items that are or could be captured at the initial point of consumer contact / point of sale by PCW's.							
It includes both existing and new Data Items that must be captured to facilitate Faster & More Reliable Switching at go-live and other additional Data Items that it might also be helpful to capture.							
'Impact if missing' has been based on comments received from parties but may not be representative of all views. Where views expressed are inconsistent this has been reflected in the notes.							
Data Item	Existing / New	Validation required	Validation owner	Impact if missing			Notes
				Switch fails	Risk of delay or failure	Sub-optimal	
<u>Personal / Contact details</u>							
Title, First Name, Surname	Existing			Red			
E-mail address	Existing			Red			Viewed as mandatory by PCWs. For suppliers it can depend on chosen contact method
Telephone/Contact Number(s)	Existing				Yellow		Important to engage consumers under faster switching timescales, but not always provided or correct
Date of Birth	Existing				Yellow		Comments described this as both mandatory and optional
<u>Supply Point / Consumption</u>							
Date of Sale	Existing			Red			Important to assess overall timeframe for the consumers journey and how long ago the customer made initial contact, but not critical
Supply Address	Existing				Yellow		Either customer address or the REL will be essential to the switch, but parties have mixed views on which.
Retail Energy Location	New				Yellow		Information held on Data Enquiry Service portals becomes critical for FMRS. Described by one supplier as 'not switch critical'
MPAN / MPRN Number	Existing			Red			
Meter Payment Type (Credit/Prepayment)	Existing			Red			Information required for each fuel
Do you have a smart meter(s)?	Existing				Yellow		Information required for each fuel
Do you have an Economy 7 meter?	Existing				Yellow		Caution needed over tariff exclusions if suppliers bill as single rate
How much do you spend/consume (for each fuel)?	Existing					Green	If unavailable from customer, industry data is available to improve cost estimates
Market Sector Indicator (Domestic/I&C)	New				Yellow		Indicator will trigger differing objection window periods (and products?). Described as 'switch critical' by one supplier. Will this information be provided by the PCW?

# Data Capture Requirements (2)

Data Item	Existing / New	Validation required	Validation owner	Impact if missing			Notes
				Switch fails	Risk of delay or failure	Sub-optimal	
<u>Tariff &amp; Payment information</u>							
Current Tariff & Supplier (if known)	Existing						Required by PCW for comparison activity.
Current payment method	Existing						
New Tariff/Product chosen	Existing						
What day of month to pay your bill?	Existing						Default date used if preference not advised
Is Billing Address same as supply?	Existing						
Paperless Billing required?	Existing						Often determined by the choice of tariff
<u>Payment / Bank details</u>							
Payment method chosen	Existing						
Account Holder (Direct Debit)	Existing						May not be mandatory for some payment types
Sort Code (Direct Debit)	Existing						May not be mandatory for some payment types
Account Number (Direct Debit)	Existing						May not be mandatory for some payment types

# Data Capture Requirements (3)

Data Item	Existing / New	Validation required	Validation owner	Impact if missing			Notes
				Switch fails	Risk of delay or failure	Sub-optimal	
<u>Consents / Additional information</u>							
Consent to bill during cool-off period	New				Yellow		Mixed opinions: Critical for some suppliers (or switch will be delayed until after cool-off ends). PCWs view as an unnecessary complication, or something easy to include in 'acceptance of Ts and Cs' tick box
Marketing / GDPR Consents	Existing					Green	
Warm Homes Discount eligibility	Existing					Green	
Priority Service Register eligibility	Existing				Yellow		
Priority Service Register information	Existing					Green	Bilateral agreements on whether/what to capture. Suppliers should be able to map data to standard industry codes
Customer requested switch date	New				Yellow		Can be up to 28 days into the future. No change in regulation but not currently offered by PCWs. An unnecessary complication for most PCWs (& customers?). Viewed as 'switch critical' by one supplier and empowering for customers.
Point of Sale Read	New					Green	Opportunity to capture a read at PoS, but PCWs are concerned that it could be a barrier for some in completing the switch application. Differing rules in gas and electricity arrangements provide complexity.
Consent to perform credit check	Existing			Red			
Credit Check related information	Existing				Yellow		Bilateral agreements on whether/what to capture.
Employment Status (for credit check)	Existing				Yellow		
Residential Status (for credit check)	Existing				Yellow		
Years at Residence (for credit check)	Existing				Yellow		Supplier formats vary: can be months or years/month
Change of Tenancy indication	New					Green	Suppliers have described as useful (or critical), but some PCWs unsure of the need for this additional question / complexity



# 3. Data Validation

## Terms of Reference

### *4.3.4 How to implement best practice for the validation of data, and ensure appropriate access to industry data (established and future) for all parties*

- The above will be considered in two parts.
- Consideration today of ‘best practice’ for the validation of data captured at the point of sale.
- Further consideration required in due course about ensuring ‘appropriate access to industry data’ – a new risk (R014) has been added to the Risk Register.

# Validation of Data

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- There was an action on Forum members at the last meeting to consider two questions:
  - 1) *What are the critical data items that require validation?*
  - 2) *How will validation requirements change (who, when, how etc) with the advent of faster switching?*
- We will consider the above questions whilst reviewing the data items contained within the 'Data Capture Requirements' document and consider any specific implications associated with the following topic areas:
  - Standstill Period, Market Sector Indicator, Meter Type Validation & Retail Energy Location
- Also, consider Risk R006 – *'Industry metering data triggers unnecessary rejections of tariff errors'*.

# Validation of Data (1)

Data Item	Existing / New	Validation required?	Validation Owner
<b><u>Personal / Contact details</u></b>			
Title, First Name, Surname	Existing	No	
E-mail address	Existing	Format	
Telephone/Contact Number(s)	Existing	Format	
Date of Birth	Existing	No	
<b><u>Supply Point / Consumption</u></b>			
Date of Sale	Existing	No	
Supply Address	Existing	Yes	
Retail Energy Location	New	Yes	
MPAN / MPRN Number	Existing	Yes	
Meter Payment Type (Credit/PP)	Existing		
Do you have a smart meter(s)	Existing		
Do you have an Economy 7 meter?	Existing		
How much do you spend/consume (for each fuel)?	Existing	If req'd	
Market Sector Indicator (Domestic/I&C)	New	Yes	

# Validation of Data (2)

Data Item	Existing / New	Validation required?	Validation Owner
<b><u>Tariff &amp; Payment information</u></b>			
Current Tariff & Supplier (if known)	Existing	No	
Current payment method	Existing	No	
New Tariff/Product chosen	Existing	Yes	
What day of month to pay your bill?	Existing	No	
Is Billing Address same as supply?	Existing	No	
Paperless Billing required?	Existing	Yes	
<b><u>Payment / Bank details</u></b>			
Payment method chosen	Existing	No	
Account Holder (Direct Debit)	Existing	No	
Sort Code (Direct Debit)	Existing	Yes	
Account Number (Direct Debit)	Existing	Format	

# Validation of Data (3)

Data Item	Existing / New	Validation required?	Validation Owner
<b><u>Consents / Additional information</u></b>			
Consent to bill during cool-off period	New	No	
Marketing / GDPR Consents	Existing	No	
Warm Homes Discount eligibility	Existing	No	
Priority Service Register eligibility	Existing	No	
Priority Service Register information	Existing	No	
Customer requested switch date	New	No	
Point of Sale Read	New	No	
Consent to perform credit check	Existing	No	
Credit Check related information	Existing	No	
Employment Status (for credit check)	Existing	No	
Residential Status (for credit check)	Existing	No	
Years at Residence (for credit check)	Existing	No	
Change of Tenancy indication	New	No	

# 4. Gas & Electricity Enquiry Services

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- There was an action on Forum members at the last meeting to consider two questions:

- *Are there specific questions or concerns that we have for GES/EES?*
- *Are these questions or concerns best answered in writing, bilaterally, or through discussion at this Forum?*

- Limited feedback received to date – comments have been raised with GES/EES:
  - *‘Clarification of total processing time with regard to synchronisation with the CSS would be helpful – for all relevant data items (inc. agent updates)’*
  - *‘Understand what capability new arrangements will bring or whether it is simply a rebranding exercise’*
  - *‘Provision of a ‘worked example’ would be a good way of demonstrating future benefits i.e. is there a known issue in the current set up that GES/EES would resolve’*
- Cognisant that the DCC (in response to questions being raised on the REL) are in the process of arranging a meeting with GES & EES. Possibly best to wait until after this session?

# 5. Conclusion of Vulnerability / PSR discussions

- There was an action on Forum members at the last meeting to consider the following question:
  - *All Forum members to provide comments on whether the use of the industry standard data list should be adopted by all parties?*
- In the absence of any substantive feedback on this question, this topic is now deemed to be concluded, as detailed within the Main Forum slide pack on 16 June (see text below).

**The Forum has acknowledged that currently, the Supplier requirements of PCWs to capture this information at the point of sale are variable. The following position has subsequently been endorsed by the Forum.**

*'Suppliers and PCWs will continue to agree on a bilateral basis, whether and how to capture this information from consumers at the point of sale. Suppliers have a obligation to identify, capture, record and update this information where applicable and there is a general Forum consensus that the consumer experience can be improved and that where questions are asked and information captured at the point of sale, it should ideally be consistent with the standard industry codes that are utilised across gas, electricity and water. Further, there is consensus that a switch can proceed without this information being captured, but Suppliers will need to consider the timing of obtaining information within the context of faster switching timeframes, particularly a next day switch. It has also been acknowledged that some consumers may be cautious about providing personal data to PCWs.'*

## 6. Consideration of process map timings

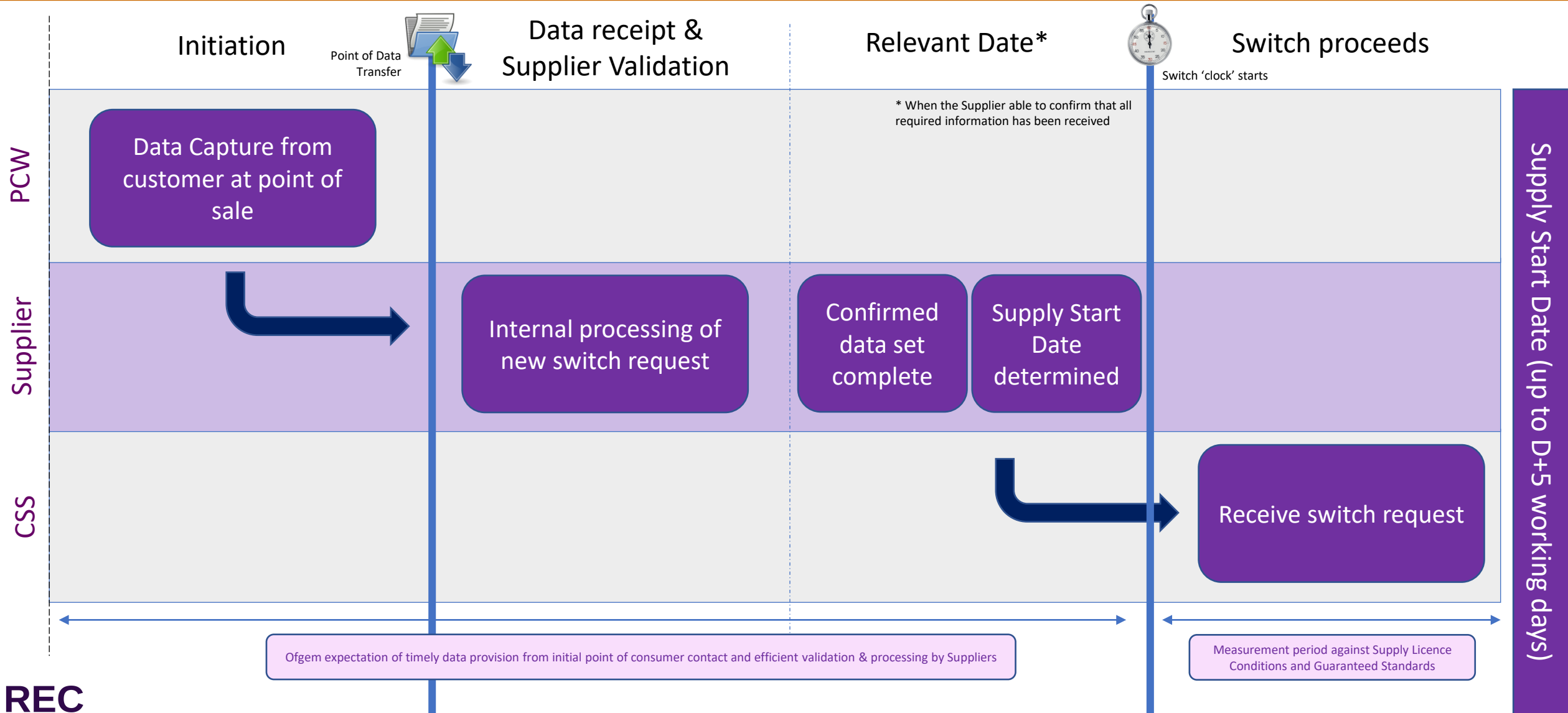
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- Clarification has been received of the definition of Relevant Date (the point at which the switch 'clock' starts).
- Further, general agreement has been reached by the Forum that determination of the Supply Start Date (SSD) is the responsibility of the Supplier, who is also responsible for communicating the SSD to the consumer.
- The above clarification and agreement reduces risk associated with delays at the front end of the process (PCW interaction with the consumer and the transfer of data to the Supplier) not having any impact upon the legal timing requirements for Suppliers conducting a switch.
- However, all parties should be mindful that Ofgem have been clear that there should be minimal delay between the initial customer request to switch and the point at which the Supplier is provided with the 'sale' information.



# Consideration of process map and timings

(for both 'five' and 'next day' working day switch)



# 7. Diary Planning & Work Plan

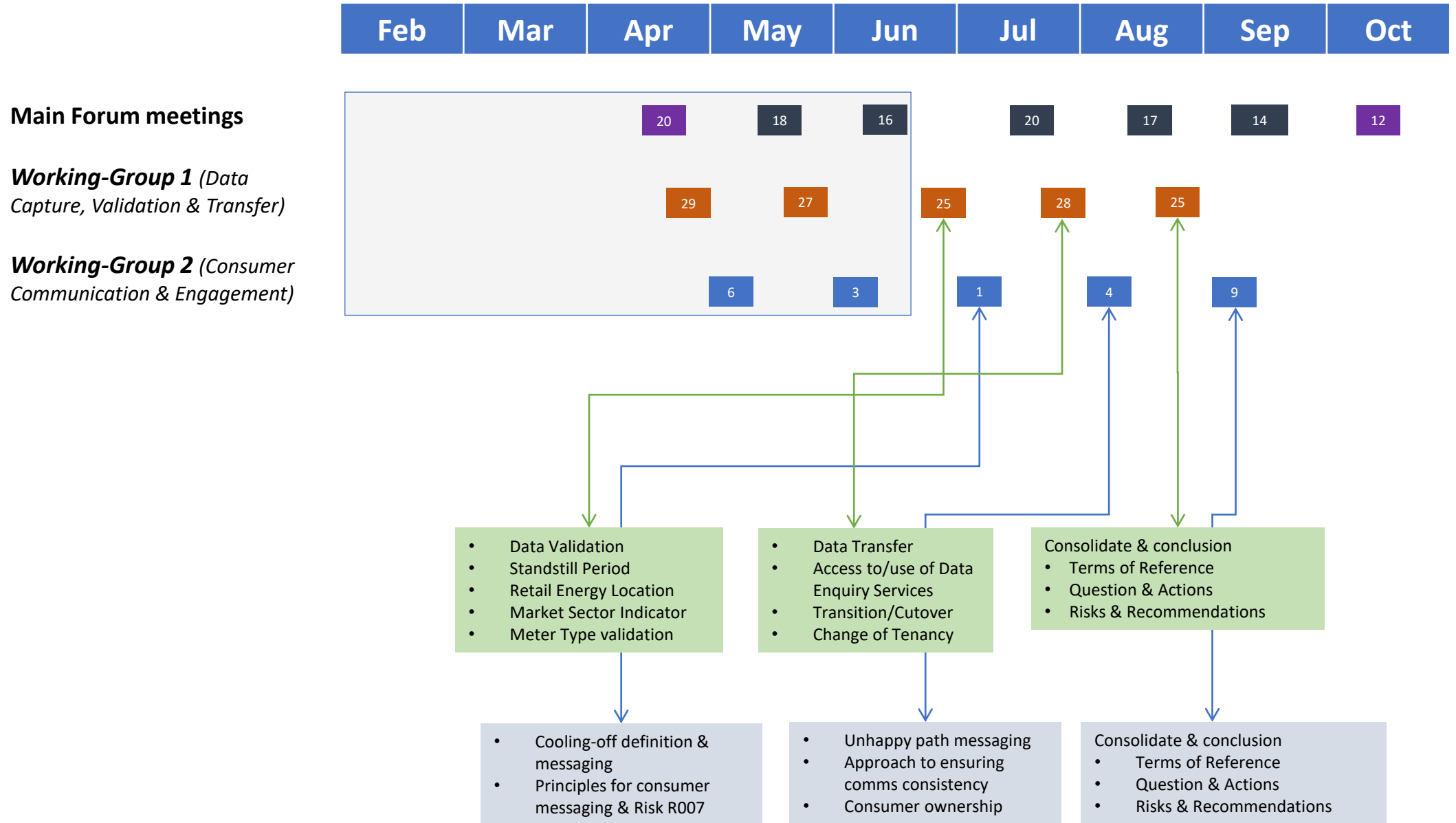
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# Future meeting dates

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Date	Time	Meeting
<b><i>Wednesday 28 July</i></b>	<i>2pm</i>	<i>Data Capture, Validation &amp; Transfer Working Group – meeting 4</i>
<b><i>Wednesday 25 August</i></b>	<i>2pm</i>	<i>Data Capture, Validation &amp; Transfer Working Group – meeting 5</i>

# Proposed approach for future Working Group meetings



# 8. Review of Actions Log

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- Actions associated with this Working Group.

# Data Capture, Validation & Transfer Working Group (1)

## Actions Log

Version Date: 22 June 2021

Ref	Date raised	Action	Update	Owner	Status
D1-001	29-Apr-21	<b>Data Capture information.</b> All Forum members to review the Data Capture information on slide 9 and provide comments to the Chair on the data items listed and any additional items that should be included for a domestic switch, based upon current arrangements.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-002	29-Apr-21	<b>New Data Capture requirements.</b> All Forum members to advise the Chair if there are any additional, new Data Capture requirements introduced by the introduction of faster switching arrangements that need to be considered, other than those captured on slide 10.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-003	29-Apr-21	<b>Vulnerable Customer/PSR considerations.</b> Although this was not discussed (slide 11 - rolled over to the next WG session), all Forum members to review the questions posed and provide any initial thoughts or comments to the Chair.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-004	29-Apr-21	<b>Data Capture – Speed of Switch.</b> All Forum members to flag to the Chair any views on whether the speed of switch (5 WD vs Next WD) has any impact on Data Capture requirements.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-005	29-Apr-21	<b>Auto-Switching and customer consent.</b> The Chair to include the topic of Auto-Switching on a future agenda for future group discussion.	To be considered at the Main Forum meeting in June. 14/6 – this topic has been included on the agenda for the 16 June Main Forum meeting.	Chair	Complete
D1-006	29-Apr-21	<b>Change of Tenancy information capture.</b> The Chair to include the topic of Change of Tenancy information capture at the point of sale on a future agenda for further group discussion.	To be considered at a future Working Group meeting. 14/6 – this topic was discussed at the 27/5 Working Group session.	Chair	Complete
D1-007	29-Apr-21	<b>Change of Tenancy information capture.</b> The Chair to add Change of Tenancy to the list of Questions for this Working Group.	This has been added (Q16) and will be considered by the Working Group in due course.	Chair	Complete
D1-008	29-Apr-21	<b>Domestic / Non-Domestic market sector indicator.</b> All Forum members to consider whether the market sector indicator should be ascertained/captured as standard at the point of sale.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete
D1-009	29-Apr-21	<b>Capture of Warm Homes discount information.</b> All Forum members to consider whether information relating to Warm Homes Discount eligibility should be ascertained/captured as standard at the point of sale.	Closed – responses received and discussed at 27/5 Working Group meeting.	Forum members	Complete

# Data Capture, Validation & Transfer Working Group (2)

## Actions Log

Version Date: 22 June 2021

Ref	Date raised	Action	Update	Owner	Status
D1-010	29-Apr-21	<b>Differing Supplier switch speeds at go-live.</b> The Chair to ensure that the communication of the Supply Start Date to the consumer is picked up by the Consumer Communication & Engagement Working Group.	To be considered at a future Consumer Comms Working Group meeting. 14/6 – this topic was discussed at the 3/6 Working Group session.	Chair	Complete
D1-011	29-Apr-21	<b>Standstill Period.</b> The Chair to ensure that the Standstill Period topic is picked up when the Working Group consider Validation.	To be considered at a future Working Group meeting. 22/6 – this topic will be discussed at the 25/6 Working Group meeting.	Chair	Complete
D1-012	29-Apr-21	<b>Retail Energy Location.</b> The Chair to approach Ofgem/DCC and request that a specific REL information session for PCWs is held at the earliest opportunity.	A request has been made to DCC/Ofgem, which has been positively received. Currently awaiting provision of possible dates. 21/5 update: DCC have confirmed that a PCW REL information session is due to be scheduled for w/c 7 June. Refer to action MF1-016.	Chair	Complete
D1-013	29-Apr-21	<b>Opening Meter Readings.</b> The Chair to provide clarity on the opening meter read windows that will be effective for both gas and electricity at go-live.	Clarity provided and topic discussed at the 27/5 Working Group meeting.	Chair	Complete
D1-014	29-Apr-21	<b>Consumer consent to bill for energy usage during cool-off - obligation.</b> The Chair to provide clarity on where the obligation resides.	Information provided as a post-meeting note within the meeting notes issued on 7 May 2021.	Chair	Complete
D1-015	29-Apr-21	<b>Consumer consent to bill for energy usage during cool-off.</b> The Chair to ensure further consideration on this topic at the Consumer Communication & Engagement Working Group – how should this be explained/presented to the consumer at the point of sale?	Ongoing consideration at Working Group meetings – see Action D1-025.	Chair	Complete
D1-016	29-Apr-21	<b>Working Group diary planning.</b> The Chair to issue calendar invites to the Forum contact list for future Working Group meetings.	Calendar invites for future DCVT Working Group meetings were issued on 6 May 2021.	Chair	Complete
D1-017	27-May-21	<b>Data Capture</b> – further to our discussions on 27 May, please advise the Chair of any further comments you have on the topics of Change of Tenancy, Credit Vetting, Opening Meter Reads, Market Sector Indicator, Consent to bill during cool-off, Consumer Requested switch dates.	27/5 - awaiting Forum member responses. 22/6 - comments received being discussed at 25 June meeting.	Forum members	Closed
D1-018	27-May-21	<b>Vulnerability/PSR</b> – consider the questions on slide 19 (of the 27 May slide pack) and advise the Chair of any views you have on this topic and/or any implications associated with the introduction of a faster switching timeframes.	27/5 - awaiting Forum member responses. 22/6 - comments received being discussed at 25 June meeting.	Forum members	Closed

# Data Capture, Validation & Transfer Working Group (3)

## Actions Log

Version Date: 22 June 2021

Ref	Date raised	Action	Update	Owner	Status
D1-019	27-May-21	<b>Data Validation</b> – ahead of the June Working Group meeting (on 25 June) please consider the following questions in readiness for discussion. 1) What are the critical data items that require validation? 2) How will validation requirements change (who, when, how etc) with the advent of faster switching?	27/5 - awaiting Forum member responses. 22/6 - comments received being discussed at 25 June meeting.	Forum members	Closed
D1-020	27-May-21	<b>Gas &amp; Electricity Enquiry Services</b> – advise the Chair of your views on whether presentation by GES and EES would be beneficial at a future Working Group session. If so why? What would you like to achieve from this? - please consider the following two questions: 1) Are there specific questions or concerns that you have for GES/EES to consider and respond to? 2) Are these questions best answered in writing, through your own bilateral engagement with these parties or through presentation and discussion at this Forum?	27/5 - awaiting Forum member responses. 22/6 - comments received being discussed at 25 June meeting.	Forum members	Closed
D1-021	27-May-21	<b>Change of Tenancy.</b> The Chair to seek data on existing usage of the CoT flag.	27/5 – action to be progressed by the Chair. 22/6 – information has been sought from gas and electricity service providers.	Chair	Closed
D1-022	27-May-21	<b>Change of Tenancy.</b> The Chair to seek data on the number of Erroneous Transfers associated with CoT.	27/5 - to be progressed by the Chair.	Chair	Ongoing
D1-023	27-May-21	<b>Opening Meter Reads.</b> The Chair to raise the issue of Opening Read window inconsistency (in gas & electricity) with the switching programme (Ofgem).	27/5 - to be progressed by the Chair. 9/6 – this issue has been raised with Ofgem, currently awaiting a response.	Chair	Ongoing
D1-024	27-May-21	<b>Market Sector Indicator.</b> All Forum members to consider how to implement the validation of the Market Sector Indicator ahead of the next Working Group meeting.	27/5 - awaiting Forum member responses. 22/6 - comments received being discussed at 25 June meeting.	Forum members	Closed
D1-025	27-May-21	<b>Consent to bill during cool-off.</b> Further written comments are invited from all Forum members on the criticality of capturing consent at the point of sale / any challenges associated with achieving this.	27/5 - awaiting Forum member responses. 22/6 – discussion on this topic has now been concluded.	Forum members	Closed
D1-026	27-May-21	<b>Vulnerability/PSR.</b> All Forum members to provide comments on whether the use of the industry standard data list should be adopted by all parties.	27/5 - awaiting Forum member responses. 22/6 - comments received being discussed at 25 June meeting.	Forum members	Closed



# 9. Risk Register

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# PCW/Supplier Forum Risk Register (Page 1)

Version Date: 22 June 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R001	Testing arrangements	Currently, switching programme end-to-end testing arrangements exclude any PCW involvement, so is therefore missing the initial data capture process. This omission could expose end-to end process shortcomings at go-live.	Consideration needs to be given to if and how PCWs and Suppliers can/should, as required and appropriate, test relevant parts of the end-to-end switching process, outside of formal programme testing arrangements. 14/6 – this risk is to be considered at the Main Forum meeting 3 on 16 June
R002	Incomplete validation against established industry data sources (DES and ECOES).	For a variety of reasons, the consistent access to and utilisation of industry data, by PCWs, is not universal. There are also challenges associated with obtaining or deriving consumption data. The advent of the Retail Energy Location (REL) and the programme requirement/expectation that this will be utilised when initialising new switch requests, will make future access to DES and ECOES by all parties essential.	There is a requirement to establish, understand and address the obstacles that are currently preventing universal access to industry data sources and how these obstacles can be removed ahead of go-live.
R003	Inconsistency in Supplier data capture requirements (by PCWs)	Suppliers have diverse product offerings, different approaches to capturing information such as vulnerable customer/priority register information and differing risk appetites to process elements such as credit vetting. Lack of a consistent or standardised data capture approach introduces complexity and cost.	Whilst recognising the requirement for differentiation, consider the development of a minimum data set, information that is required to enable a faster switch (both 5 working day and next day switch). 14/6 – this is currently being progressed by the Data Capture, Validation & Transfer Working Group
R004	Differing data communication arrangements, between PCWs and Suppliers	The existing arrangements facilitate a diverse range of data communication/provision solutions. Whilst current arrangements are predominantly based upon batch processing solutions, processes are starting to evolve (in a non-standard manner), with the introduction of differing API solutions.	Whilst respecting existing commercial arrangements between PCWs and Suppliers and being cognisant of strategic reform that might take occur under the auspices of the Energy White Paper, consider any changes that might be required to better facilitate the implementation of faster switching arrangements in Summer 2022 and consider what an ideal, future target operating model will need to look like to enable next day switching as standard.

# PCW/Supplier Forum Risks Register (Page 2)

Version Date: 22 June 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R005	Switch status updates and feedback mechanisms between PCWs and Suppliers	There is a lack of consistent, robust feedback mechanisms that prevent the efficient and timely flow of information between PCWs and Suppliers during the switch process. All parties in the change of supply chain are therefore not always aware of the switch status, particularly problematic where there are process delays and a lack of certainty over which party the consumer might make contact with to investigate/complain.	Consider what improvements could be made to the existing arrangements to mitigate any process issues or consumer detriment.
R006	Industry metering data triggers unnecessary rejections or tariff errors	Many Suppliers treat legacy two-rate rate meters as single rate for billing. Problems can occur where this is not transparent to PCWs.	Further consideration required to establish the extent of this risk and what actions could be undertaken to mitigate.
R007	Potential for customer confusion as the timeframe for switch completion dramatically reduces	The overlap of standstill, cool-off and speed of switch has the potential to confuse customers, particularly if multiple communications are being received from multiple sources (PCW, Old Supplier, New Supplier) within a short period of time. Additional confusion as to who 'owns' the customer at which point of the process, particularly an issue where there is a rejection or blockage in the switch process.	To be considered and addressed by the Customer Communication & Engagement Working Group.
R008	Absolute clarity required of 'relevant date' (when the switch clocks starts ticking)  <b>RISK CLOSED</b>	All switch processes, requirements and obligations will rest on the clear definition of 'relevant date'. This is particularly important when trying to manage customer communications and expectations, measuring overall switch timeframes & performance and enabling compliance with legislation and guaranteed standards.	Ofgem are currently in the process of providing clarity within revised licence drafting. 14/6 – Ofgem published updated proposed drafting for the gas and electricity supply licences in May 2021, which includes an updated definition of 'Relevant Date' – see clause 14A.20. In practice, the switch 'clock' will start at the point when the Supplier determines that sufficient information to conduct the switch has been provided.'

# PCW/Supplier Forum Risks Register (Page 3)

Version Date: 22 June 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R009	Change of Tenancy events and Auto-Switching arrangements.	Change of Tenancy (CoT) events can cause particular problems with auto-switching, including the creation of erroneous transfers and customer inconvenience/detriment.	Further Forum discussion required to consider what improvements could be made to mitigate customer detriment. 14/6 – the topic of Auto-Switching is due to be discussed at the Main Forum meeting 3 on 16 June
R010	Data Enquiry Services – future resilience and availability improvements.	It will be critical for Data Enquiry Services to have high levels of resilience and availability as the industry moves to faster switching timeframes.	Requirement to engage with Data Enquiry Service providers to discuss and consider any actions necessary.
R011	Retail Energy Location – limited PCW engagement/education of REL requirements and impacts  <b>RISK CLOSED</b>	To date PCWs have had minimal information provided to them about the introduction of the Retail Energy Location and there is currently nothing in place to enable formal engagement with DCC/Ofgem on this topic.	The Chair has taken an action to speak with DCC/Ofgem and seek the provision of REL information session for PCWs. 14/6 – the DCC held a REL information session for PCWs on 14 June. Future sessions will be established by DCC to follow-up on discussion and actions agreed.
R012	Collective Switching providers – lack of awareness of switching programme  <b>RISK CLOSED</b>	There is a risk that parties who are responsible for progressing collective switch arrangements are unaware of the switching programme and therefore unaware of any potential implications, specifically in relation to transition/cutover from the existing to the new arrangements.	14/6 - the Chair has written to the switching programme/Ofgem advising of the position that has been endorsed by the Forum on this topic/risk. <i>‘As the topic of Collective Switching is out of scope of the Forum’s Terms of Reference, that it is added to the Risk Register and immediately flagged to the switching programme/Ofgem for their awareness and consideration of any required interaction with, or communication to, Collective Switch providers.’</i>

# PCW/Supplier Forum Risks Register (Page 4)

Version Date: 22 June 2021

ID	RISK	DESCRIPTION & IMPACT	NEXT STEPS
R013 <b>NEW</b>	Retail Energy Location. PCWs and Suppliers have ongoing concerns about how to access and use the REL and the changes required to existing processes ahead of go-live.	PCWs have noted disappointment that they were not involved or considered in the design and that the change impacts are much higher than anticipated. Supplier have also raised concerns about orchestration and whether the licencing arrangements are fit for purpose. General view that there are currently more 'unknowns than knowns' which prevents parties from having a coherent view of how this will work in practice and what changes will be required.	22/6 - DCC are currently progressing a series of action from the recent Supplier and PCW REL engagement sessions on 14 June. The Chair continues to have ongoing engagement with the DCC and Ofgem on this risk.
R014 <b>NEW</b>	Data Enquiry Services. Not all PCWs currently have access to the Gas & Electricity Data Enquiry Services.	It will be essential for all PCWs to have access to and utilise Gas & Electricity Enquiry Services at the point of go-live.	Engagement required with PCWs, Enquiry Service Providers and Ofgem to fully understand the current blockers and discuss how best to mitigate.

# 10. AOB

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# Appendices

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# PCW/Supplier Forum Work Plan v1.0

